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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's
Own motion into the service quality standards for
All telecommunications carriers and revisions to
General Order 133-B

R.02-12-004

OPENING COMMENTS OF

SUREWEST TELEPHONE (U 1015 C)

ON ASSIGNED COMMISSIONER'S RULING AND SCOPING MEMO

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May 14, 2007

**OPENING COMMENTS OF
SUREWEST TELEPHONE (U 1015 C)**

ON ASSIGNED COMMISSIONER'S RULING AND SCOPING MEMO

SureWest Telephone (U 1015 C) ("SureWest") hereby files these opening comments on the Assigned Commissioner's Ruling and Scoping Memo dated March 30, 2007 ("Ruling") concerning service quality standards for all telecommunications carriers in California. In summary, and as explained in more detail below, SureWest requests that the Commission adopt a market-driven approach to monitoring and regulating service quality for all carriers subject to the Commission's Uniform Regulatory Framework ("URF") established in D. 06-08-030 (the "URF Phase I Decision"). Such an approach should lead to the elimination of existing reporting measures and standards unless they are clearly cost-justified. Similarly, no new service quality requirements should be adopted unless the benefits of such rules exceed the costs.

In the URF Phase I Decision, the Commission recognized the significant competition that SureWest and other URF carriers are facing. *See, e.g., D.06-08-030, mimeo*, at p. 123 (discussing lack of ILEC market power, and the wide variety of SureWest competitors). One of the results of this competition is that carriers who do not offer high levels of service quality will be punished in the marketplace, as customers move to carriers who provide better service. There is no justification for adopting or maintaining service quality rules that interfere with this fluid, self-policing process. SureWest's service quality has been consistently high, and based on the findings in the URF Phase I Decision, there is no reason to believe that service quality rules are necessary to ensure that SureWest's service quality remains high. SureWest has – and will continue to have – every incentive to provide high-quality service to customers.

In light of the competitive phenomena at work in the current market, the costs of the service quality requirements under General Order ("G.O.") 133-B outweigh any benefits of these

1 measurements. These requirements should be eliminated for URF companies and other carriers
2 operating in competitive markets. No new service quality rules should be adopted. To the extent that
3 the Commission wants to obtain additional data about service quality, this data should be collected
4 through a carefully-crafted, consumer-focused survey prepared by an independent third party. If such
5 a survey is pursued, it should examine data regarding all types of competitors in the
6 telecommunications market from the consumer perspective.
7

8 **I.**

9 **THIS COMMISSION HAS REPEATEDLY FOUND THAT**
10 **SUREWEST PROVIDES CONSISTENTLY GOOD SERVICE**

11 As SureWest (then "Roseville Telephone Company") explained in its March 7, 2003 opening
12 comments in this proceeding, the Commission has previously found that SureWest provides high-
13 quality service. *See Opening Comments of Roseville Telephone*, at pp. 3-4. Since these comments
14 were filed, SureWest has continued to provide excellent service quality. Moreover, in the FCC's
15 February 2007 report on "Quality of Service of Incumbent Local Exchange Carriers," the FCC
16 analyzed recent trends in wireline service quality and found that "most of these trends are indicative
17 of long term improvement."¹
18

19 As this Commission completes its service quality examination, it will doubtless receive
20 proposals for onerous and expensive proposals involving new and continued measures and standards.
21 The Commission should review such proposals in the context of company-specific and industry-wide
22 data that demonstrate overall good quality service. When service quality is high, and competition is
23 abundant, the Commission should not impose or maintain requirements with high compliance costs
24 without correspondingly large and clear benefits.
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1 II.

2 **MARKET FORCES WILL FORCE SUREWEST AND OTHER CARRIERS**
3 **TO MAINTAIN AND IMPROVE THE QUALITY OF THE SERVICES THEY OFFER, AND**
4 **TO DEVELOP INNOVATIVE RESPONSES TO CUSTOMER NEEDS**

5 As the URF Phase I Decision found, SureWest faces vigorous competition for a wide variety
6 of services. This competition will force SureWest to continue to look for ways to improve its service
7 quality so that it does not lose customers to other carriers who are competing based on the quality of
8 their services and their responsiveness to customers. The record in this proceeding already contains
9 ample evidence to support this proposition. *See, e.g., Reply Testimony of Robert G. Harris in*
10 *R. 02-12-004 Prepared for SBC California*, dated May 5, 2003. With the proliferation of carriers
11 competing on price, service quality, features, and customer convenience, the disciplining effect of
12 competition is significant, and it will only increase. Since the Commission received its last round of
13 comments in this proceeding in May 2003, VoIP providers have entered the market, cable companies
14 have aggressively expanded their offerings, and wireless services have continued to explode.² As the
15 URF Phase I Decision demonstrates, each of these market participants has become a robust
16 competitor of traditional wireline carriers.

17 A good example of how service quality measurements and reporting standards have become
18 irrelevant in light of fierce competition is directory assistance answering time. This measure and
19 standard is the subject of General Order 133-B, Section 3.7. It provides that all traffic offices that
20 receive 2,000 or more calls per day are to answer 85% within 12 seconds. As the attached article
21 from the April 23, 2007 edition of *Business Week* demonstrates, some service providers are already
22 offering – and Google is testing – a free directory assistance service. *See* Attachment A. Under these
23 offerings, all that a customer would need to do to obtain free directory assistance service is listen to a
24 15-second advertisement. This obviously poses a competitive dilemma for other providers of
25 directory assistance service. Do they compete on price or answering time, or do they adopt some
26 other strategy to gain a competitive edge? This phenomenon makes Section 3.7 of General Order

27
28 ¹ FCC Report, p. 2. The report can be found at http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-270855A1.pdf.
This report does not specifically measure SureWest's service quality.

² Notably, Comcast is now offering its cable telephone service throughout SureWest's service territory.

1 133-B obsolete. There is no need for the Commission to require measurement and reporting of
2 directory assistance operator answer time when carriers are competing on the various characteristics
3 and features of that service. The Commission should keep this example in mind as it evaluates the
4 various proposals made by the parties in this proceeding.

5 In evaluating the need for service quality measurements, the Commission should also be
6 mindful that applying service quality measurements only to certain market actors can create market
7 distortions. VoIP providers and other unregulated providers of telecommunications services would
8 not be subject to rules promulgated by this Commission. The Commission should be wary of
9 imposing such obligations on regulated carriers who must compete with those unregulated entities.

10 III

11 COMMENTS ON DISCRETE ISSUES 12 IDENTIFIED BY THE COMMISSION IN THE RULING

13 Annual Customer Surveys.

14 SureWest believes that a professionally-designed survey concerning service quality,
15 conducted by an experienced, independent third party may be useful to the Commission. Such a
16 survey, if adopted, could be crafted with input from carriers and other participants, possibly after
17 workshops, and it could be funded by a surcharge imposed on the customers of all carriers providing
18 telecommunications services, much as several parties have proposed in Phase II of the URF
19 proceeding addressing monitoring. The adoption of such a survey regime would make additional
20 service regulation unnecessary unless the surveys disclose serious problems. A survey of this sort,
21 combined with the Commission's regular complaint processes, should be sufficient to identify any
22 major service quality problems. Once identified, the Commission could use its investigative and/or
23 enforcement powers to respond as may be appropriate.
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1 **ARMIS Reporting.**

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3 As the Ruling correctly observes, SureWest does not report ARMIS service quality data to the
4 FCC. Requiring SureWest to do so would impose a very large additional expense on SureWest and
5 yield no corresponding benefit to customers or SureWest. This additional requirement would place
6 SureWest at a disadvantage relative to most of its competitors. The Commission should only require
7 the reporting of ARMIS service quality data by those entities that are already required to supply this
8 information to the FCC. The costs of compliance for those carriers would be minimal, since they
9 would simply be able to copy the ARMIS reports and provide them to this Commission. As
10 discussed above, imposing requirements of this sort on SureWest would further regulatory disparities
11 between SureWest and the unregulated providers against which SureWest competes. Unless and
12 until the FCC imposes this requirement on SureWest, this Commission should not impose a separate
13 requirement regarding ARMIS service quality data. The customer survey data discussed above and
14 the Commission's complaint procedures will provide adequate information for the Commission to
15 monitor carriers' service quality.
16

17 **Reporting Major Service Interruptions.**

18
19 SureWest currently reports major service interruptions to the Commission. Service
20 interruptions are extremely rare on SureWest's network, and it has no objection to continuing this
21 process. However, SureWest recommends that the Commission replace its existing outage reporting
22 requirements with the FCC's reporting scheme, as outlined in 47 C.F.R. Section 63.100. The
23 Commission's current outage requirements stem from an obscure 1977 informal staff notice that has
24 never been officially endorsed by the full Commission as applicable to all carriers. The scope and
25 meaning of this notice are far from clear. Although SureWest will continue complying with the
26 requirements of the notice to the best of SureWest's understanding, the Commission would be better
27 served to endorse the FCC's outage reporting mechanisms, which are much clearer and were vetted
28

1 through an extensive rulemaking process at the federal level.

2 **Current Company-Specific Measures.**

3
4 SureWest is currently subject to the reporting obligations contained in this Commission's
5 General Order 133-B. In view of the high level of competition faced by SureWest, these reporting
6 requirements are no longer required and should be eliminated as soon as reasonably possible. Again,
7 SureWest's competitors do not have these requirements, nor do they have the associated compliance
8 costs. Since the Commission cannot impose such conditions on all carriers in the competitive
9 marketplace, the Commission should eliminate these requirements for SureWest, the other URF
10 carriers, and competitive local exchange carriers.
11

12 **CONCLUSION**

13 SureWest is committed to providing high-quality service to its customers, as it must to remain
14 competitive in today's telecommunications market. SureWest regularly monitors its network to
15 ensure reliability, and continues to look for ways to provide swifter and more user-friendly forms of
16 customer service. SureWest faces steep competition, and in light of this competition, SureWest must
17 remain vigilant in its service quality efforts. Given the nature of the competitive market in which
18 SureWest operates and the findings of the URF Phase I Decision, there is no justification for
19 continuing existing service quality requirements, or for adopting new ones. SureWest does not
20 believe that any such measurements can withstand a cost-benefit analysis, nor could they be justified
21 in the current competitive marketplace. Rather than impose onerous and expensive carrier-specific
22 requirements, the Commission should rely on a carefully-crafted, customer-focused survey to gauge
23 the state of service quality in California's telecommunications market. Between this survey data and
24 the Commission's complaint processes, the Commission should have sufficient information to detect
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1 and respond to any major problems in the service quality arena.

2 Executed at San Francisco, California this 14th day of May, 2007.

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ATTACHMENT A

Chrysler overcome one other big disadvantage: Its small size and overexposure to the U.S. Chrysler sells maybe 200,000 midsize cars a year—a fraction of what Honda, Toyota, and GM sell worldwide. Those giants spread costs over sales of 1 million to 2 million family cars, reaping huge advantages in parts-buying and factory use. That pays off development costs quickly and boosts margins. Add a partner like PSA or one of the Koreans, and they can combine sales to push down costs for parts, engines, and engineering work. That's something that Mercedes, whose luxury cars can't easily share parts with Chrysler vehicles, rarely gave its American partner.

Then there's the lending business. Daimler and Chrysler married their finance units thoroughly. A new owner could split out Chrysler's portion of the loan business. But the company would still need to set up back-office and underwriting operations, Stallkamp says. Daimler could keep the financial-services business and charge Chrysler fees for writing loans. Or Chrysler and Daimler could jointly run the finance company, but then they would have to share the profits—which are big on this side of

Handled well, the obstacles could strengthen Chrysler

the business. One other possibility that could be a boon for Chrysler's buyer: The new owner takes all of DaimlerChrysler Financial Services and charges Daimler for loans.

Bigger challenges loom on the R&D front. Chrysler closed down its research unit in 2004, turning over

most advanced work in hybrid-electric cars and hydrogen fuel cell research to Daimler. Again, Chrysler could rely on Daimler for fuel-cell development and continue to use the GM-BMW-Daimler hybrid joint venture. That's no big deal—many companies are pairing up to share the expense of developing clean, fuel-efficient cars.

But there's the catch. Chrysler has a hybrid partnership, but it's one of the last carmakers to bring a hybrid to market. Daimler has 100 fuel-cell vehicles on the road globally, though most of them carry the Mercedes name. A new partner might work faster. In any case, says Stallkamp, "the Daimler merger answered a lot of questions for Chrysler. Now that it's going away, someone needs to answer those same questions." ■

SEARCH ENGINES

FREE INFORMATION, PLEASE

Google is the latest to offer directory assistance, as phone companies squirm

BY OLGA KHARIF

MA BELL HAS YET another reason to be wary of Google Inc. The Web search leader is testing a free service that lets callers search for business listings from a landline or mobile phone by dialing 1-800-GOOG-411. Google will even connect the call and text the number to the user's cell phone—all for no charge.

Google, which already was dabbling in citywide Wi-Fi services, is one of several tech players that are swarming the \$8 billion-a-year directory assistance business. In March, Microsoft Corp. acquired Tellme Networks Inc., which provides automated directory assistance services to telcos like Cingular/AT&T. Tellme is testing a free 411 service of its own (1-800-555-TELL). Ultimately, says Daniel Phibbs, an analyst at the Pierz Group, free 411 may expand the market, pulling in callers who now resist paying an average of \$1.28 per 411 call over a regular phone line and \$1.57 via cell phone.

Free information services are made possible by short-paid advertisements. At some point in the call, you may hear an ad to get McDonald Corp.'s latest happy meal or to check out CBS's latest episode of *CSI*. Advertisers see this as a chance to grab consumers at the point they're contemplating a purchase.

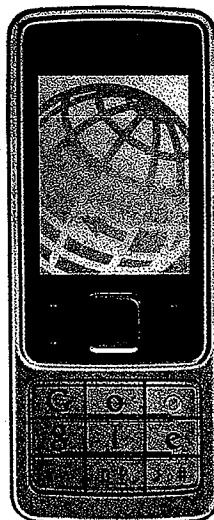
One of the more successful services, Jingle Networks Inc. (1-800-FREE-411),

has nabbed 5% of the directory assistance market in just a year and a half of operating. Its advertisers include McDonald's, 1-800-FLOWERS, and CBS. Jingle says it has handled more than 200 million calls. The Menlo Park (Calif.) company has yet to turn a profit, but has had no apparent trouble raising funds from such investors as Goldman, Sachs & Co. and Comcast Interactive Capital, an investing arm of Comcast Corp., the largest U.S. cable provider.

Directory assistance is just one of many ways search engines like Google can bring the Web to mobile phones. Once they've served up a number, why not also shoot over directions? To keep costs low, though, there can be trade-offs in quality. Some free 411 services, such as Google's, rely only on voice-recognition software rather than live operators and sometimes fail to complete calls, says Phibbs. Google's service hung up on a reporter requesting a number for a coffee shop in Portland, Ore.

15-SECOND ADS

STILL, BIG PHONE companies see the writing on the wall. In December, AT&T began testing its own free 411 calling (1-800-935-5697) in three markets: Bakersfield, Calif., Oklahoma City, and Columbus, Ohio. Callers get listings for free in exchange for listening to two 15-second ads, one at the beginning and one toward the end of their call. In coming months, the phone giant plans to expand the trial to other metropolitan areas, says AT&T spokesman Fletcher Cook. ■



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2
3
4 CERTIFICATE OF SERVICE BY MAIL

5 I, Noel Gielegthem, declare:

6 I am a resident of the State of California, over the age of eighteen years, and not a party to the
7 within action. My business address is COOPER, WHITE & COOPER LLP, 201 California Street,
8 17th Floor, San Francisco, CA 94111.

9 On May 14th, 2007, I served the following:

10
11 **OPENING COMMENTS OF**
12 **SUREWEST TELEPHONE (U 1015 C)**
13 **ON ASSIGNED COMMISSIONER'S RULING AND SCOPING MEMO**
14

15 by placing a true and correct copy thereof with the firm's mailing room personnel for mailing in
16 accordance with the firm's ordinary practices to the following:

17 ATTACHED SERVICE LIST.

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Executed on May 14th, 2007 at San Francisco, California.
20

21 
22 _____
23 Noel Gielegthem
24
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26
27
28

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CPUC Service List as of May 10, 2007 Proceeding No. R. 02-12-004

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